

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

NOTICE OF MOTION TO FILE UNDER SEAL

TAKE NOTICE THAT Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, pursuant to the Letter of this Court dated June 5, 2025 (ECF #344), moves this Court for leave to file under seal Exhibit 1 to the Memorandum in Support of RLP’s Motion to File under Seal. Exhibit 1 is the Plaintiff’s Confidential Status Report.

This serves as public notice that RLP is moving to file the above document under seal. RLP’s grounds for seeking leave to file the above pleading under seal are set forth in its Motion to File under Seal and Memorandum in Support. Any party or non-party who opposes or objects to the sealing of this document must file its objection with the Clerk of Court within seven (7) days after the filing of this Motion to File under Seal. If no objection is filed in a timely manner, the Court may treat the Motion to File under Seal as uncontested.

This 12th day of June, 2025.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983)
K. Barrett Luxhoj, Esquire (VS. No. 86302)
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of June, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

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